## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

MICHAEL T. DREHER, Individually and on behalf of a class of similarly situated persons	) ) ) Civil Action No. 3:11-cv-624 (JAG)
Plaintiff,	) Judge: The Hon. Judge A. Gibney, ) Jr.
v.	)
EXPERIAN INFORMATION SOLUTIONS, INC., CARDWORKS INC., and CARDWORKS SERVICING, LLC	) ) )
Defendant.	)
	)
	) )

## CONSENT MOTION TO MODIFY THE COURT'S SUPPLEMENTAL SCHEDULING ORDER

COMES NOW Defendant, Experian Information Solutions, Inc. ("Experian"), by counsel, and pursuant to Fed. R. Civ. P. 6(b), and moves this Court to modify its Supplemental Scheduling Order to enlarge the time within which discovery must be completed. Experian represents that counsel for Plaintiff has consented to the modification of the Court's Supplemental Scheduling Order to: (1) enlarge the time within which discovery must be completed until on or before December 6, 2013; and (2) enlarge the time within which Plaintiff shall file the Motion for Class Certification until on or before December 23, 2013. Experian further states that this modification does not alter any other dates specified in the Court's Supplemental Scheduling Order. The Parties have attached hereto a proposed Order for the Court's consideration and entry.

Dated: October 3, 2013 Respectfully Submitted,

/s/ Joseph W. Clark

Joseph W. Clark Virginia State Bar No. 42664 JONES DAY

51 Louisiana Avenue, N.W. Washington, DC 20001-2113 Telephone: (202) 879-3939 Facsimile: (202) 626-1700 Email: jwclark@jonesday.com

Counsel for Defendant EXPERIAN INFORMATION SOLUTIONS, INC.,

## **CERTIFICATE OF SERVICE**

A copy of the foregoing was filed with the Court via the CM/ECF system. The foregoing was served this 3rd day of October, 2013, on the following filing users by the CM/ECF system:

Leonard Anthony Bennett Consumer Litigation Associates, PC 12515 Warwick Blvd., Suite 100 Newport News, VA 23606 Telephone: 757-930-3660 Facsimile: 757-930-3662 Email: lenbennett@cox.net

Counsel for Plaintiff

Kristi Cahoon Kelly Surovell Isaacs Petersen & Levy PLC 4010 University Dr., Suite 200 Fairfax, VA 22030 Telephone: 703-251-5400 Facsimile: 703-591-9285

Counsel for Plaintiff

Email: kkelly@smillaw.com

Susan Mary Rotkis Consumer Litigation Assoc PC 12515 Warwick Blvd., Suite 100 Newport News, VA 23606 Telephone: 757-930-3660 Facsimile: (757) 930-3662 Email: srotkis@clalegal.com

Counsel for Plaintiff

/s/ Joseph W. Clark

Joseph W. Clark Virginia State Bar No. 42664 JONES DAY 51 Louisiana Avenue, N.W. Washington, DC 20001-2113 Telephone: (202) 879-3939 Facsimile: (202) 626-1700

Facsimile: (202) 626-1700 Email: jwclark@jonesday.com

Counsel for Defendant EXPERIAN INFORMATION SOLUTIONS, INC.